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Attorneys for Defendant
CONNECTU, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

THE FACEBOOK, INC. and MARK
ZUCKERBERG,

Plaintiffs,

v.

CONNECTU, INC. (formerly known as
CONNECTU, LLC), PACIFIC NORTHWEST
SOFTWARE, INC., WINSTON WILLIAMS,
and WAYNE CHANG,

Defendants.

CASE NO. 5:07-CV-01389-JW

**CONNECTU'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

**(1) CONNECTU, INC.'S OPPOSITION
TO PLAINTIFFS' OBJECTIONS TO
AND MOTION TO STRIKE EVIDENCE
SUBMITTED IN CONNECTU'S
OPPOSITION TO PLAINTIFFS'
CONFIDENTIAL MOTION; AND**

**(2) DECLARATION OF STEVEN C.
HOLTZMAN IN SUPPORT OF
CONNECTU'S OPPOSITION TO
PLAINTIFFS' OBJECTIONS TO AND
MOTION TO STRIKE EVIDENCE
SUBMITTED IN CONNECTU'S
OPPOSITION TO PLAINTIFFS'
CONFIDENTIAL MOTION**

1 Pursuant to Civil L.R. 7-11 and 79-5(d), ConnectU respectfully submits this
2 administrative motion asking the Court to file under seal (1) ConnectU, Inc.’s Opposition
3 To Plaintiffs’ Objections To And Motion To Strike Evidence Submitted In ConnectU’s
4 Opposition To Plaintiffs’ Confidential Motion, and (2) Declaration Of Steven C.
5 Holtzman In Support Of ConnectU’s Opposition To Plaintiffs’ Objections To And
6 Motion To Strike Evidence Submitted In ConnectU’s Opposition To Plaintiffs’
7 Confidential Motion.

8 The parties entered into, and the Superior Court of California, Superior County
9 issued, a Stipulated Protective Order on January 23, 2006, prohibiting either party from
10 filing in the public record any documents that have been designated as “Confidential” or
11 “Highly Confidential” pursuant to the protective order.

12 (1) ConnectU, Inc.’s Opposition To Plaintiffs’ Objections To And Motion To
13 Strike Evidence Submitted In ConnectU’s Opposition To Plaintiffs’ Confidential Motion,
14 and (2) Declaration Of Steven C. Holtzman In Support Of ConnectU’s Opposition To
15 Plaintiffs’ Objections To And Motion To Strike Evidence Submitted In ConnectU’s
16 Opposition To Plaintiffs’ Confidential Motion contain information that Facebook has
17 asserted is covered by the Protective Order and/or are alleged by Plaintiffs to implicate
18 confidentiality provisions found in a purported agreement which is the subject of dispute
19 between the parties.¹

20 ConnectU requests that its Opposition To Plaintiffs’ Objections To And Motion
21 To Strike Evidence Submitted In ConnectU’s Opposition To Plaintiffs’ Confidential
22 Motion, and Declaration Of Steven C. Holtzman in support thereof remain sealed.
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26 ¹ By filing this request to seal, ConnectU does not waive any arguments or rights as to (i) the admissibility
27 or inadmissibility of evidence surrounding the purported agreement, (ii) the confidentiality or non-
28 confidentiality of information relating to the purported agreement, or (iii) the enforceability or
unenforceability of the purported agreement.

1 Dated: June 20, 2008

2 _____
3 /s/ Steven C. Holtzman
4 Steven C. Holtzman

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19 Attorneys for Defendant
20 CONNECTU, INC.

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that this document(s) filed through the ECF system will be sent
3 electronically to the registered participants as identified on the Notice of Electronic Filing
4 (NEF) and paper copies will be sent to those indicated as non registered participants on
5 June 20, 2008.
6

7 Dated: June 20, 2008

8 /s/ Steven C. Holtzman
9 Steven C. Holtzman